

BY EMAIL

30 January 2025

Hi Ofgem,

On behalf of Siemens, I have a couple of comments regarding the consultation 'Proposed Directions to Elexon about reporting on Market-wide Half-Hourly Settlement (MHHS) implementation and about managing MHHS Testing cohorts'.

- Overall, we support the consultation and the need for reporting.
- Elexon information to Ofgem is only useful if it is accurate. How/when will Elexon obtain updates from all parties? Will parties have visibility of the update shared to Ofgem? I understand that a guidance document will be published in February that should answer these questions. However, I wanted to point out that alignment is crucial for Ofgem to receive complete and up-to-date information from Elexon.
- Section 2.24. In theory 40% seems reasonable. However, the threshold is meaningless if a disproportionate number of potentially difficult MPANs are still outstanding.
- Section 2.25. The key point here needs to be the reasons for shortfall. If MPANs are being delayed due to appointment issues or disputes that require cross-party coordination, these may not be quick to resolve. I suggest a dual trigger for the M15/M16 discussion, a high percent migrated, and a low percent shortfall (with a delay reason that could be difficult to resolve).

With best regards,
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